

# **EXHIBIT 1**

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**From:** Jeff Nardinelli  
**Sent:** Thursday, June 08, 2017 12:33 PM  
**To:** Brun, Shane  
**Subject:** RE: Call tomorrow - Otto Trucking RFPs

Shane, nothing official or binding here, but I've grouped Otto Trucking's RFPs as below to help discuss more efficiently on our call today. 415-975-6325

### Group A

OT-05	All documents supporting Waymo's claim that "Mr. Levandowski installed special software on his Waymo laptop to access the design server" as described in paragraph 44 of the Waymo Complaint, including all documents relating to and supporting Waymo's claim in its Motion for Preliminary Injunction that Mr. Levandowski downloaded and installed TortoiseSVN software on his Waymo laptop and used that software to access Waymo's SVN server.
OT-08	All documents supporting Waymo's claim that "Mr. Levandowski then download over 14,000 proprietary files from that [design] server" as described in paragraph 44 of the Waymo Complaint.
OT-25	All documents supporting Waymo's claim that "On December 14, 2015, Mr. Levandowski attached a removable media device (an SD Card) to the laptop containing the downloaded files for approximately eight hours" as described in paragraph 45 of the Waymo Complaint.
OT-29	All documents supporting Waymo's claim that "On December 18, 2015, seven days after Mr. Levandowski completed his download of confidential Waymo information and four days after he removed the SD Card, he reformatted the laptop" as described in paragraph 46 of the Waymo Complaint.
OT-33	All documents supporting Waymo's claim that "Mr. Levandowski used his Waymo credentials and security clearances to download additional confidential Waymo documents to a personal device" as described in paragraph 47 of the Waymo Complaint.
OT-44	Documents sufficient to show to any collection, analysis, review, or findings related to Waymo computers, email, or other devices of Mr. Levandowski, current Waymo employees and/or Waymo devices of former employees upon their departure from Waymo LLC or Project Chauffeur since January 2009.
OT-46	All documents relating to any forensic investigation and analysis of computers, including laptop computers, and other devices, or images thereof, used by Mr. Levandowski prior to his departure from Waymo.

### Group B

OT-37	Documents sufficient to identify the content of Waymo's SVN server.
OT-38	Documents sufficient to show the total number and size of files stored on Waymo's SVN server.
OT-39	Documents sufficient to show the total number and size of files stored on Waymo's SVN server relating to Waymo's LiDAR technology.
OT-42	Documents sufficient to show the total number and size of files stored on Waymo's SVN server relating to specifications of Waymo's LiDAR technology.
OT-43	Documents sufficient to show the total number and size of files stored on Waymo's SVN server relating to the manufacture, assembly, calibration, and testing of Waymo's LiDAR technology.

### Group C

OT-40	Documents sufficient to identify all data management systems where Waymo confidential or and/or proprietary technical documents or information are stored.
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OT-41	Documents sufficient to identify users with access to each of the data management systems responsive to RFP No. 40.
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**Group D**

OT-27	Documents sufficient to show how files transferred from Waymo computer or server to a personal computer or removable media device are secured against unauthorized access.
OT-28	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding the use of a personal computer or a removable media device, including flash drives.
OT-32	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding the formatting of Waymo computers.
OT-47	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding the use of computers, email, or other devices for work on behalf of Waymo.
OT-48	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding access to Waymo documents, data, or information by Waymo employees.
OT-49	Documents sufficient to show any Waymo policy, procedure, or guideline against deleting documents, data, or information from Waymo computers, email, or other devices.
OT-50	Any versions of an employee handbook applicable to Waymo employees, including members of Project Chauffeur, from 2009 to the present.

**Group E**

OT-06	Documents sufficient to identify each Waymo employee, including members of Project Chauffeur, who has installed on his or her computer TortoiseSVN or other software that may be used to access Waymo's SVN server.
OT-15	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded file(s) or information stored on Google Drive relating to Waymo's LiDAR technology from January 2014 to the present.
OT-16	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded device file(s) or information from Google Drive to a personal computer or media device from January 2014 to the present.
OT-19	Detailed records, logs, metadata, and other information sufficient to show each download from Google Drive relating to Waymo's LiDAR technology from January 2014 to the present, including, for each download, at least the following: the employee requesting the download, the time of download, the location and device to which the file(s) or information was downloaded, the file(s) downloaded, the number files downloaded, and the volume of files downloaded.
OT-20	Detailed records, logs, metadata, and other information sufficient to show each instance in which an employee transferred information from a Waymo computer or server to a personal computer or removable media device.
OT-21	Detailed records, logs, metadata, and other information sufficient to show each instance from January 2014 to the present in which a foreign device was detected to be attached to, or removed from, an employee's device, including, but not limited to, any log generated by Google's endpoint security solutions, Bit9.
OT-26	Documents sufficient to show how often Waymo employees, including members of Project Chauffeur, download file(s) or information to a personal computer or a removable media device, such as flash drives.
OT-30	Documents sufficient to show how often Waymo computers are reformatted.
OT-31	Documents sufficient to show how often Waymo computers are reformatted to install the Linux operating system.
OT-34	Documents sufficient to show how often Waymo employees, including members of Project Chauffeur, download "TL weekly updates" documents.
OT-45	All electronic images or backup image files of computers, including laptop computers, and other devices used by Mr. Levandowski prior to his departure from Waymo.

**Group F**

OT-01	Documents sufficient to identify all Waymo employees, including members of Project Chauffeur, who have access to Waymo's SVN server.
OT-02	Documents sufficient to identify all Waymo employees, including members of Project Chauffeur, who have accessed Waymo's SVN server from January 2014 to the present.
OT-03	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding accessing Waymo's SVN server.
OT-04	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding which employees have access to Waymo's SVN server.
OT-07	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding the installation and use of TortoiseSVN or other software that may be used to access Waymo's SVN server.
OT-09	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, accessed Waymo's SVN server from January 2014 to the present.
OT-10	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, accessed or viewed file(s) or information stored on Waymo's SVN server relating to Waymo's LiDAR technology from January 2014 to the present.
OT-11	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded file(s) or information from Waymo's SVN server from January 2014 to the present.
OT-12	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded file(s) or information stored on Waymo's SVN server relating to Waymo's LiDAR technology from January 2014 to the present.
OT-13	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded device file(s) or information from Waymo's SVN server to a personal computer or media device from January 2014 to the present.
OT-14	Documents sufficient to show how often Mr. Levandowski, and other Waymo employees, including members of Project Chauffeur, downloaded file(s) or information relating to Waymo's LiDAR technology from Waymo's SVN server to a personal computer or media device from January 2014 to the present.
OT-17	Detailed records, logs, metadata, and other information sufficient to show each access to Waymo's SVN server from January 2014 to the present, including, for each access, at least the following: the employee requesting access, time of access, the location and device from which Waymo's SVN server was accessed, the file(s) or information accessed, the number files accessed, and the volume of files accessed.
OT-18	Detailed records, logs, metadata, and other information sufficient to show each download from Waymo's SVN server from January 2014 to the present, including, for each download, at least the following: the employee requesting the download, the time of download, the location and device to which the file(s) or information was downloaded, the file(s) downloaded, the number files downloaded, and the volume of files downloaded.
OT-22	All software applications required to view and analyze the records, logs, metadata or other information produced in response to RFP Nos. 17-21.
OT-23	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding the download of file(s) or information from Waymo's SVN server.
OT-24	Documents sufficient to show any Waymo policy, procedure, or guideline, including but not limited to any training, regarding any practice of downloading versus viewing file(s) or information from Waymo's SVN server.
OT-35	Documents sufficient to show the number of times that Waymo employees, including members of Project Chauffeur, downloaded more than 10,000 files in one instance or at one time.
OT-36	Documents sufficient to show the number of times that Waymo employees, including members of Project Chauffeur, downloaded more than 1 GB of information in one instance or at one time.

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**From:** Brun, Shane [mailto:[SBrun@goodwinlaw.com](mailto:SBrun@goodwinlaw.com)]  
**Sent:** Wednesday, June 07, 2017 5:11 PM  
**To:** Jeff Nardinelli <[jeffnardinelli@quinnmanuel.com](mailto:jeffnardinelli@quinnmanuel.com)>  
**Subject:** Re: Call tomorrow - Otto Trucking RFPs

What number should I call?

Sent from my iPhone

On Jun 7, 2017, at 5:04 PM, Jeff Nardinelli <[jeffnardinelli@quinnmanuel.com](mailto:jeffnardinelli@quinnmanuel.com)> wrote:

Works for me thanks.

----- Original message-----

**From:** Brun, Shane  
**Date:** Wed, Jun 7, 2017 5:00 PM  
**To:** Jeff Nardinelli;  
**Cc:**  
**Subject:** Re: Call tomorrow - Otto Trucking RFPs

How about 1:00?

Sent from my iPhone

On Jun 7, 2017, at 4:58 PM, Jeff Nardinelli <[jeffnardinelli@quinnmanuel.com](mailto:jeffnardinelli@quinnmanuel.com)> wrote:

Hi Shane,

Sorry to miss you today. I have a call tomorrow from 9:30 – 10:30 am but otherwise free to talk whenever you would like.

Thanks,  
Jeff

**Jeff Nardinelli**  
*Associate*,  
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor  
San Francisco, CA 94111  
415-875-6325 Direct  
415.875.6600 Main Office Number  
415.875.6700 FAX  
[jeffnardinelli@quinnmanuel.com](mailto:jeffnardinelli@quinnmanuel.com)  
[www.quinnmanuel.com](http://www.quinnmanuel.com)

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